

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant Sandler, Travis & Rosenberg, P.A. 1300 Pennsylvania Avenue, N.W. Suite 400 Washington, DC 20004		2. Registration No. SB 5303 4698 4699
3. Name of foreign principal Ministry of Commerce, Royal Kingdom of Cambodia	4. Principal address of foreign principal #20 A & B Preah, Phnom Penh,	
5. Indicate whether your foreign principal is one of the following type: <input checked="" type="checkbox"/> Foreign government <input type="checkbox"/> Foreign political party <input type="checkbox"/> Foreign or <input type="checkbox"/> domestic organization: If either, check one of the following: <input type="checkbox"/> Partnership <input type="checkbox"/> Corporation <input type="checkbox"/> Association <input type="checkbox"/> Committee <input type="checkbox"/> Voluntary group <input type="checkbox"/> Other (specify) _____ <input type="checkbox"/> Individual—State his nationality _____		
6. If the foreign principal is a foreign government, state: a) Branch or agency represented by the registrant. Ministry of Commerce b) Name and title of official with whom registrant deals. Cham Prasidh, Minister of Commerce		
7. If the foreign principal is a foreign political party, state: a) Principal address N/A b) Name and title of official with whom registrant deals. c) Principal aim		

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal N/A

b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

Directed by a foreign government, foreign political party, or other foreign principal..... Yes ☐ No ☐

Controlled by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

Financed by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

Subsidized in whole by a foreign government, foreign political party, or other foreign principal..... Yes ☐ No ☐

Subsidized in part by a foreign government, foreign political party, or other foreign principal..... Yes ☐ No ☐

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

N/A

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N/A


Date of Exhibit A 12/3/98	Name and Title Teresa M. Polino, Partner	Signature 
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Exhibit B
To Registration Statement
Pursuant to the Foreign Agents Registration Act of 1938, an amended

OMB No. 1105-0007

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications to such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. One original and two legible photocopies of this form shall be filed for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

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Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant

Sandler, Travis & Rosenberg, P.A.

2. Registration No.

4698 4699 56 5303

3. Name of Foreign Principal

Ministry of Commerce of the Kingdom of Cambodia

Check Appropriate Boxes:

4. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.

5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.

6. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.

7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Provide advice during bilateral textile consultations on November 30 through December 2, 1998.


8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Provide economic data, analysis and strategic advice during bilateral textile quota consultations.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Discussions with the Department of State, Department of labor and Office of the U.S. Trade Representative seeking support for Cambodian positions during bilateral textile quota consultations

Date of Exhibit B	Name and Title	Signature
12/3/98	Teresa M. Polino,	

Partner

Footnote: Political activity as defined in Section 1(o) of the Act means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political interests, policies, or relations of a government of a foreign country or a foreign political party.

SANDLER, TRAVIS & ROSENBERG, P. A.

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SANDLER & TRAVIS
TRADE ADVISORY SERVICES

DALLAS
DETROIT
SACRAMENTO
CONSULTING SERVICES

November 2, 1998

*NOT ADMITTED IN DC
*BOARD CERTIFIED IMMIGRATION & NATIONALITY LAW

His Excellency Cham Prasidh
Minister of Commerce
#20 A&B Preah Norodom Blvd.
Phnom Penh, Kingdom of Cambodia

By Facsimile: (855)23-426396

RE: Consulting Services During Textile Negotiations

Dear Minister Prasidh:

Pursuant to your request during our meeting today, Sandler, Travis & Rosenberg, P.A. (the "Firm") hereby submits its proposal to provide advice and counsel to the Government of Cambodia during bilateral textile negotiations with the United States.

As you know, the U.S. recently issued a call to Cambodia with regard to Cambodia's exports to the U.S. of cotton knit shirts and cotton sweaters. The U.S. requested consultations with Cambodia to discuss quotas on exports of cotton knit shirts in categories 338/339, cotton sweaters in category 345, and cotton and man-made fiber gloves in categories 331/631. Discussions with key U.S. government officials indicate that the U.S. wishes to control imports in several other categories, including trousers and shorts in categories 347/348 and woven shirts and blouses in 340/341. As you may recall, the U.S. had expressed a desire to impose a quota on 347/348 during the consultations last year on 331/631.

Therefore, these negotiations will be significantly more complex and difficult, and as Cambodia has yet to join the WTO, they will be held under the more stringent rules of Article 204 of the Agriculture Act of 1956 of the United States, as opposed to the trading rules established under the Agreement on Textiles and Clothing (ATC) of the WTO.

We believe it is extremely important that Cambodia enter these negotiations well prepared to address not only the called categories, but also any other categories and concerns

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SANDLER, TRAVIS & ROSENBERG, P. A.
His Excellency Cham Prasidhn, Minister of Commerce
November 2, 1998
Page 2

that may come up during the negotiations. The Cambodian negotiating team must be armed with effective negotiating strategies and up to the minute statistics. Our firm is uniquely placed to provide this assistance during the consultations. Having advised Cambodia during the previous negotiations, we understand the issues and offers that arose during those consultations. Our contacts and experience in the area of textile and apparel trade is unmatched. We are prepared to assign our key personnel to these negotiations, including former Chief Textile Negotiator Bill Houston, Chandri Navarro-Bowman, Nicole Bivens Collinson, Dennis Wakeman and myself.

ADVICE AND COUNSEL DURING BILATERAL NEGOTIATIONS

The Firm would provide assistance in bilateral textile negotiations with the United States Government on the categories at issue 338/339, 345 and 331/631, as well as any others which arise during the consultations, as follows:

1. Developing a negotiating strategy which will provide maximum benefits for exports of apparel from Cambodia to the U.S. The Firm will provide an assessment of all potential strategies and arguments to be used during consultations. The Firm will work with the Cambodian industry and the Cambodian Government to develop arguments to make the terms of the agreement as beneficial to the Cambodian apparel industry as possible. Possible concessions expected by the U.S. in exchange for additional quota will be examined. The Firm shall advise and consult with Cambodian and U.S. Government officials during the negotiations to review any U.S. proposals to ensure that Cambodia receives the best possible treatment for its apparel exports to which it is entitled under U.S. law.
2. Technical Support During Negotiations. In order to keep the Government of Cambodia and its apparel manufacturers fully informed of Cambodia's status in the American textile market, the Firm will provide key trade information and statistics necessary as technical support during negotiations. It is of paramount importance that Cambodia enter consultations and negotiations well advised and prepared with U.S. textile trade statistics in order to obtain the most favorable and equitable results. The Firm will provide all relevant statistical and market information to enable Cambodia to strongly defend its positions and interests.

SANDLER, TRAVIS & ROSENBERG, P. A.
His Excellency Cham Prasidh, Minister of Commerce
November 2, 1998
Page 3

3. Consultations with Representatives of the Government of Cambodia and industry officials prior to and during negotiations with the United States. The members of our Firm will meet with key Cambodian government and industry officials to establish negotiating priorities consistent with industry objectives. Additional meetings and/or conversations will be held to advise negotiators on strategic adjustments to be made during the bilateral negotiations. Firm personnel will also consult with U.S. industry advisors when advisable.

FEES FOR NEGOTIATION SERVICES

Services for negotiations on the recently called categories, as well as any others which may arise during the consultations, as described above, will be an initial fee of US\$50,000, and US\$10,000 per month for the first three months, and US\$5,000 per month for the succeeding three months. These fees would cover all rounds of negotiations and meetings to brief Cambodian government and industry officials during that time period.

In addition to these fees, expenses such as travel, hotel, telephone, fax, mailing, etc., shall be borne by the client. No major expense (in excess of US\$500) will be incurred without prior approval of the Government of Cambodia

If you are in agreement with this proposal, please sign below and return it to me by fax at my Washington, DC office at (202)638-2236 or my hotel in Hong Kong at (852) 2369-9976. Please do not hesitate to contact me if you have any questions regarding our proposal at the Royal Garden Hotel in Hong Kong at 2721-5215 or on my cellular phone at 9159-5111.

Sincerely,

SANDLER, TRAVIS & ROSENBERG, P. A.

BY:


Thomas G. Travis

Accepted and Agreed:

Royal Kingdom of Cambodia


His Excellency Minister Cham Prasidh

date: Nov 3, 1998

cc: Van Sou Ieng, Wing Tai Apparel (Cambodia) Ltd.

SANDLER, TRAVIS & ROSENBERG, P. A.

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November 17, 1998

His Excellency Cham Prasidh
Minister of Commerce
#20 A&B Preah Norodom Blvd.
Phnom Penh, Kingdom of Cambodia

By Facsimile: (855)23-426396, 362678 or 427358

His Excellency Minister Prasidh:

I hope this letter finds you well. We received the signed contract but want to reiterate that the contract will not commence until we receive a deposit for the initial fee of \$50,000. We are looking forward to your visit. Please do not hesitate to contact me at (202)638-2230, fax (202)638-2236, e-mail: cnb@strtrade.com or Tom Travis at (305)267-9200, e-mail: ttravis@strtrade.com with any questions.

Best Regards,

SANDLER, TRAVIS & ROSENBERG, P.A.

BY: 
Chandri Navarro-Bowman

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